

STEPHANIE I. SPRECHER
 Acting United States Attorney
 JEREMY A. GROSS (WY Bar # 7-5110)
 Assistant United States Attorney
 P.O. Box 668
 Cheyenne, WY 82003-0668
 Telephone: 307-772-2124
jeremy.gross@usdoj.gov

FILED
 U.S. DISTRICT COURT
 DISTRICT OF WYOMING
 2025 MAR 21 AM 10:35
 MARGARET DOTKINS, CLERK
 CHEYENNE

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA

Plaintiff,

v.

\$19,380.00 U.S. CURRENCY

Defendant.

)
)
)
)
)
)
)
)
)
)
)

Case No. **25-cv-81-J**

UNITED STATES OF AMERICA'S MOTION FOR WARRANT OF ARREST *IN REM*

The United States of America, by and through the Acting United States Attorney for the District of Wyoming, and Assistant United States Attorney Jeremy A. Gross, moves the Court for an Order directing the Clerk of Court to issue a Warrant of Arrest *in Rem* for the Defendant Property listed in the caption above. In support of its motion, the United States submits the following:

1. The Defendant Property consists of \$19,380.00 in U.S. Currency seized on May 27, 2024, from 1457 Sweetwater Road, Apartment B3, Douglas, Wyoming.
2. Law enforcement officers determined that there was probable cause to believe that the Defendant Property is: (1) money furnished or intended to be furnished by a person in exchange for a controlled substance in violation of the Controlled Substances Act (21 U.S.C. § 841(a)(1));

(2) proceeds traceable to such an exchange; or (3) money used or intended to be used to facilitate a violation of the Controlled Substances Act. 21 U.S.C. §§ 841(a)(1).

3. The Defendant Property is therefore subject to civil forfeiture to the United States pursuant to 21 U.S.C. §§ 881(a)(6).

4. The United States has filed a Verified Complaint for Forfeiture *in Rem*, which establishes the legal and factual basis supporting the forfeiture of the Defendant Property. (Doc. 1). In that complaint, the United States asserts the Defendant Property is in federal custody. (*Id.* at ¶ 5).

5. Because the Defendant Property is in the government's possession, custody, or control, pursuant to Fed. R. Civ. P. Supp. R. G(3)(b)(i), the Clerk of Court must issue a Warrant of Arrest *in Rem*.

6. As required by Fed. R. Civ. P. Supp. R. G(2)(f), the facts set forth in the Verified Complaint supports a reasonable belief that the government will be able to meet its burden of proof at trial; specifically, that the United States will be able to show by a preponderance of the evidence that the Defendant Property constitutes property subject to forfeiture.

WHEREFORE, the United States respectfully requests that this Court enter an Order directing the Clerk to issue the Warrant of Arrest *in Rem* for the Defendant Property and to deliver the original warrant to the undersigned Assistant United States Attorney, who will arrange for service of process pursuant to law.

DATED this 21st day of March 2025.

STEPHANIE I. SPRECHER
Acting United States Attorney

By:


JEREMY A. GROSS
Assistant United States Attorney